

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WASHINGTON NATIONAL INSURANCE  
COMPANY and BANKERS CONSECO LIFE  
INSURANCE COMPANY,

Plaintiffs,

v.

MOSHE M FEUER, et al.,

Cross-Claim and Third-Party  
Defendants.

16-cv-07646 (ER)

**JOINT STIPULATION AND [PROPOSED] ORDER OF DISMISSAL WITH  
PREJUDICE PURSUANT TO FED. R. CIV. P. 41(a)(2)**

**WHEREAS**, on September 29, 2016, Washington National Insurance Company and Bankers Consec Life Insurance Company (together, “CNO”) filed a complaint in the above-captioned action against, *inter alia*, Moshe M. Feuer and Scott Taylor (ECF No. 1), and subsequently filed an amended complaint (ECF No. 52) adding Beechwood Capital Group LLC as a defendant (together with Feuer and Taylor, the “Settling Defendants,” and together with CNO, the “Settling Parties”);

**WHEREAS**, on March 15, 2018, the Court issued an opinion and order (ECF No. 84) compelling arbitration and staying the action pending the outcome of that arbitration;

**IT IS HERBY JOINTLY STIPULATED AND AGREED** by and between the Settling Parties, by their respective attorneys, as follows:

1. CNO hereby dismisses its complaint as against the Settling Defendants with prejudice; and
2. Each Settling Party is to bear its own attorneys’ fees, costs, and expenses.

Dated: November 14, 2019  
New York, New York

Respectfully submitted,

ALSTON & BIRD LLP



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*Attorneys for Plaintiffs Washington  
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*Attorneys for Defendants Moshe M. Feuer,  
and Beechwood Capital Group LLC*

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*Attorneys for Defendant Scott Taylor*

SO ORDERED:

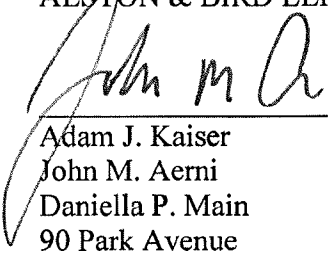
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United States District Judge

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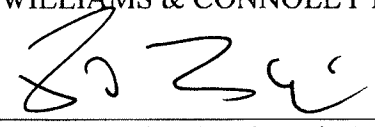
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*Attorneys for Defendant Scott Taylor*

SO ORDERED:

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United States District Judge